

**UNITED STATES DISTRICT COURT**  
**FOR THE SOUTHERN DISTRICT OF NEW YORK**

ARLENE J. DELGADO,  
Plaintiff,

-vs-

No. 19-cv-11764 (AT) (KHP)

DONALD J. TRUMP FOR PRESIDENT, INC.,  
TRUMP FOR AMERICA, INC., SEAN SPICER,  
individually, REINCE PRIEBUS, individually,  
and STEPHEN BANNON, individually,

Defendants.

**MOTIONS TO COMPEL**

Pursuant to the Court's May 14, 2024, Plaintiff has leave to file various motions to compel. Plaintiff, for efficiency's sake, moves on various matters within one filing:

**MOTION TO COMPEL UNANSWERED QUESTIONS STEMMING FROM DEPOSITION OF BRADLEY PARSCALE**

Said Motion to Compel requires the quoting of specific questions and the attachment of relevant portions of a transcript. Plaintiff only has part of Mr. Parscale's deposition transcript (due to the Court limiting Mr. Parscale's April 2024 deposition to only 2.5 hours, a continued deposition was taken on a later date, May 7<sup>th</sup>). Plaintiff has, however, ordered the remaining transcript and will receive the transcript within 10 business days of date-of-order, on Tuesday, May 28<sup>th</sup>. Plaintiff thus seeks the Court's permission to file the disputed questions by June 1<sup>st</sup>.

**MOTION TO COMPEL REGARDING SUBPOENA ON BRIAN WALSH**

On May 10, 2024, Plaintiff received a notification from an attorney, purporting to supply a response to the subpoena on Mr. Walsh. The email contained a link, to an unfamiliar app, and an email, from another individual, would contain the 20-digit password. Setting up an account with this 'app' is required. Plaintiff attempted to do so but it did not work. Plaintiff notified the attorney. The attorney then re-sent a link to the same software/app. Again, it did not work. Plaintiff informed the attorney that she was unable to access the documents, on Tuesday, May 14, 2024. Plaintiff has not heard back, as of the filing of this motion, on May 17, 2024. Plaintiff asks that the Court compel Mr. Walsh, via his counsel, to promptly provide the material in a reasonably accessible manner.

**MOTION TO COMPEL REGARDING THE ERIC TRUMP PRIVILEGE LOG**

The May 14, 2024 Order grants leave to file a motion to compel regarding an appropriate privilege log to be provided by Eric Trump (attached as **Attachment A**).

The Order instructed Plaintiff to meet and confer with Mr. Trump's counsel by May 17, 2024. Plaintiff has already tried to do so, more than once: Plaintiff reached out to Mr. Trump's counsel, Alina Habba, about such, on April 5, 2024. Plaintiff received no response. Plaintiff followed up again on the email, on May 16, 2024, and again received no response.

The privilege log has multiple errors: It violates the S.D.N.Y. requirement that the relationship amongst the listed individuals should be described if not apparent; it withholds in full each and every one of the 145 entries (indicating a blanket approach); and multiple entries list no sender or recipient at all. (Additionally, the font size also makes the document very difficult to review and the log is not in any order, and certainly not chronological order.)

"A party invoking the attorney-client privilege has the burden of showing, as to each allegedly privileged communication, that the communication was (1) between counsel and client, (2) intended to be and remained confidential, and (3) made for the purpose of providing or obtaining legal advice." *In re Chevron Corp.*, 749 FSupp2d 141, 164-65 (SDNY 2010) Mr. Trump's log does not meet this burden.

***It is also well-established that one of the classic and highly common inadvertent waivers of attorney-client privilege are the copying of a non-party/non-attorney in the communications. As such, the majority of the items noted in the log do not, in fact, qualify for attorney-client privilege protection:***

NOTE: For ease of review, individuals who are NOT attorneys to the Defendant-Campaign and are also not staff-members of the Defendant-Campaign (i.e., are not part of the *client*), and thus likely create a waiver by virtue of inclusion, are in **bold**.

#1: Cannot be withheld as privileged because not an email with client and because non-attorney/non-party is/are included.

Email to Larry Rosen (attorney for the Campaign) from **Eric Trump** (works for Trump Org / not the Campaign), cc'ing **Lara Trump** (works at Giles Parscale – not the Campaign) and **Alan Garten** (an attorney for Trump Org and not part of the Campaign).

#2: Cannot be withheld as privileged because non-attorney non-party is/are included.

Email to Michael Glassner (Campaign COO) ([mglassner@donaldtrump.com](mailto:mglassner@donaldtrump.com)) from **Lara Trump** (works for Giles Parscale – not the Campaign) ([lara@gilesparscale.com](mailto:lara@gilesparscale.com)), cc'ing **Eric Trump** (works for Trump Org - not the Campaign) ([etrump@trumporg.com](mailto:etrump@trumporg.com)) and copying **Alan Garten** (an attorney for the Trump Organization and not part of the Campaign) ([agarten@trumporg.com](mailto:agarten@trumporg.com)).

#3: Cannot be withheld as privileged because non-attorney non-party is/are included.

Email to **Lara Trump** (works for Giles Parscale – not the Campaign) from Michael Glassner (Campaign COO), cc'ing **Eric Trump** (works for Trump Org - not the Campaign) and copying **Alan Garten** (an attorney for Trump Org and not part of the Campaign).

#4 through #9: Cannot be withheld as privileged because it is not with the client.

Emails between **Eric Trump** (works for Trump Org / not the Campaign) and Larry Rosen, the attorney for the Campaign.

#10 - #11: Cannot be withheld as privileged because non-attorney non-party is/are included. Emails between Larry Rosen (attorney for the Campaign) and **Eric Trump** (works for Trump Org / not the Campaign), **Alan Garten** (an attorney for Trump Org and not part of the Campaign), and Michael Glassner.

#12 - #18: Cannot be withheld as privileged because it is not with the client. Emails are between Larry Rosen (attorney to the Campaign) and **Eric Trump** (works for Trump Org / not the Campaign).

#19: Cannot be withheld as privileged because non-attorney non-party is/are included. Email to **Eric Trump** (works for Trump Org / not the Campaign) and Michael Glassner from Larry Rosen, cc'ing **Alan Garten** (an attorney for Trump Org and not part of the Campaign) and Patrick McPartland (attorney to the Campaign) .

#20: Cannot be withheld as privileged because it neither recipient is part of the Trump Campaign/client. Email to **Eric Trump** (works for Trump Org / not the Campaign) and **Alan Garten** (an attorney for Trump Org and not part of the Campaign) from Larry Rosen

#21: Cannot be withheld as privileged: Does not even list any sender or recipient at all.

#22: Cannot be withheld as privileged because not sent to client and because non-attorney non-party is included. Email to **Eric Trump** (works for Trump Org / not the Campaign) from **Alan Garten** (an attorney for Trump Org and not part of the Campaign).

#23 - #24: Cannot be withheld as privileged: Does not even list any sender or recipient at all.

#25 - #27: Cannot be withheld as privileged because it is the Trump Campaign attorney emailing with a non-client. Emails between **Eric Trump** (works for Trump Org / not the Campaign) and Larry Rosen

#28: Cannot be withheld as privileged because non-attorney non-party is/are included and email is from non-client. Email to Larry Rosen and **Eric Trump** (works for Trump Org / not the Campaign) from **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#29 - #32: Cannot be withheld as privileged because non-attorney non-party is/are included. Emails among **Eric Trump** (works for Trump Org / not the Campaign), **Alan Garten** (an attorney for Trump Org and not part of the Campaign), Michael Glassner, Larry Rosen (cc'ing Patrick McPartland)

#33: Cannot be withheld as privileged because sent to non-client. Email to **Eric Trump** (works for Trump Org / not the Campaign) from Larry Rosen

#34: Cannot be withheld as privileged: Does not list any sender or recipient at all

#35: Cannot be withheld as privileged because sent to non-client and because non-attorney non-party is/are included. Email to **Eric Trump** (works for Trump Org / not the Campaign) from Larry Rosen (cc'ing **Alan Garten**, an attorney for Trump Org and not part of the Campaign)

#36: Cannot be withheld as privileged: Does not list any sender or recipient at all

#37-38: Cannot be withheld as privileged because non-attorney non-party is/are included. Emails among Larry Rosen, **Eric Trump** (works for Trump Org / not the Campaign), **Alan Garten** (an attorney for Trump Org and not part of the Campaign), and Michael Glassner

#39-41: Cannot be withheld as privileged because non-attorney non-party is/are included and because email are not with the client. Emails among **Eric Trump** (works for Trump Org / not the Campaign), Larry Rosen, and **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#42 – 52: Cannot be withheld as privileged because non-attorney non-party is/are included. Emails among Michael Glassner, **Eric Trump** (works for Trump Org / not the Campaign), Larry Rosen, **Alan Garten** (an attorney for Trump Org and not part of the Campaign), and Patrick McPartland

#53: Cannot be withheld as privileged because non-attorney non-party is/are included. Email to **Eric Trump** (works for Trump Org / not the Campaign) from Larry Rosen, cc'ing **Alan Garten** (an attorney for Trump Org and not part of the Campaign) and Michael Glassner. Also, subject matter is regarding “Jason Miller” and not this case or Plaintiff.

#54 - #55: Cannot be withheld as privileged because non-attorney non-party is/are included. Emails among **Donald J. Trump, Jr.** (works for Trump Org / not the Campaign), **Eric Trump** (works for Trump Org / not the Campaign), Michael Glassner, **Alan Garten** (an attorney for Trump Org and not part of the Campaign), and Larry Rosen, cc'ing Patrick McPartland

#56: Cannot be withheld as privileged because non-attorney non-party is/are included. Email to an attorney at Jones Day from **Alan Garten** (an attorney for Trump Org and not part of the Campaign), cc'ing Larry Rosen, **Eric Trump** (works for Trump Org / not the Campaign), and **Matthew Maron** (Trump Org employee)

#57 - #62: Cannot be withheld as privileged because non-attorney non-party is/are included. Emails among attorney at Jones Day, Larry Rosen, Michael Glassner, **Alan Garten** (an attorney for Trump Org and not part of the Campaign), cc'ing **Eric Trump** (works for Trump Org / not the Campaign), **Mathew Maron** (Trump Org employee), and Jones Day attorney

#63: Cannot be withheld as privileged because non-attorney non-party is/are included. Email to Larry Rosen and **Eric Trump** (works for Trump Org / not the Campaign) from **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#64 - #65: Cannot be withheld as privileged because email is to a non-Campaign employee/non-Campaign executive. Emails between **Eric Trump** (works for Trump Org / not the Campaign) and Alex Cannon ([acannon@donalddtrump.com](mailto:acannon@donalddtrump.com)) (Trump Campaign attorney)

#66: Cannot be withheld as privileged as neither here is a Trump Campaign attorney or the client, and both would need to be. Email to **Eric Trump** (works for Trump Org / not the Campaign) from **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#67 - #68: Cannot be withheld as privileged because non-attorney non-party is/are included. Emails among Susie Wiles (staff member of the 2024 Campaign), **Alina Habba** (an attorney for the Save America PAC and attorney for Donald Trump personally on various matters, and who ultimately appeared at Eric Trump's deposition in this case), **Eric Trump** (works for Trump Org / not the Campaign), and **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#69 - #70: Cannot be withheld as privileged as neither here is a Trump Campaign attorney or the client, and both would need to be. Emails to **Eric Trump** (works for Trump Org / not the Campaign) from **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#71 - #72: Cannot be withheld as privileged as emails are between Trump Campaign attorney and an outside third-party at the Trump Organization: Emails between **Eric Trump** (works for Trump Org / not the Campaign) and Larry Rosen

#73 - #74: Cannot be withheld as privileged because copied are two individuals who are neither client (Campaign) nor attorneys to the Campaign: Emails between Michael Glassner and Larry Rosen, cc'ing **Alan Garten** (an attorney for Trump Org and not part of the Campaign), **Eric Trump** (works for Trump Org / not the Campaign)

#75 - #77: Cannot be withheld as privileged because no attorney to the Trump Campaign is part of this email: Emails between Michael Glassner, **Eric Trump** (works for Trump Org / not the Campaign), and **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#78: Cannot be withheld as privileged because copied are two individuals who are neither client (Campaign) nor attorneys to the Campaign: Email to Michael Glassner from Larry Rosen, cc'ing **Eric Trump** (works for Trump Org / not the Campaign) and **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#79: Cannot be withheld as privileged: No sender or recipient listed at all

#80 - #81: : Cannot be withheld as privileged because emails are between a Trump Campaign attorney and an outside third-party at the Trump Organization: Emails between **Eric Trump** (works for Trump Org / not the Campaign) and Larry Rosen

#82: Cannot be withheld as privileged because no attorney to the Trump Campaign is included: Email to **Eric Trump** (works for Trump Org / not the Campaign), **Alan Garten** (an attorney for Trump Org and not part of the Campaign), and **Lara Trump** (works at Giles Parscale – not the Campaign) from Michael Glassner

#83: Cannot be withheld as privileged because third parties are copied who are neither the client, nor attorneys to the Campaign: Email to Larry Rosen and **Alan Garten** (an attorney for Trump Org and not part of the Campaign) from **Eric Trump** (works for Trump Org / not the Campaign), cc'ing Michael Glassner, **Donald J. Trump, Jr.** (works for Trump Org / not the Campaign) and **Lara Yanuaska** (Lara Trump) at [larayunaska@gmail.com](mailto:larayunaska@gmail.com)

#84 - #85: Cannot be withheld as privileged because email is from an attorney to another entity, and also non-party/non-attorney is copied: Emails among Larry Rosen and **Alan Garten** (an attorney for Trump Org and not part of the Campaign), cc'ing Michael Glassner and **Eric Trump** (works for Trump Org / not the Campaign)

#86: Cannot be withheld as privileged because non-party/non-attorney is copied: Email to **Eric Trump** (works for Trump Org / not the Campaign), Michael Glassner, and **Alan Garten** (an attorney for Trump Org and not part of the Campaign) from Larry Rosen

#87 - #92: Cannot be withheld as privileged because non-party/non-attorney is copied: Emails among Larry Rosen, **Alan Garten** (an attorney for Trump Org and not part of the Campaign), and **Eric Trump** (works for Trump Org / not the Campaign)

#93 - #94: Cannot be withheld as privileged because non-party/non-attorney is copied: Emails among **Eric Trump** (works for Trump Org / not the Campaign), **Alan Garten** (an attorney for Trump Org and not part of the Campaign), Michael Glassner, and Larry Rosen

#95 - #99: Cannot be withheld as privileged because non-party/non-attorney is copied: Emails among Larry Rosen, **Eric Trump** (works for Trump Org / not the Campaign), and Michael Glassner

#100 - #102: Cannot be withheld as privileged because non-party/non-attorney is copied: Emails among Larry Rosen, **Eric Trump** (works for Trump Org / not the Campaign), and Michael Glassner, cc'ing **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#103: Cannot be withheld as privileged: This cannot be withheld as privileged, **as it cc's Plaintiff**. Email to **Eric Trump** (works for Trump Org / not the Campaign) from Larry Rosen, cc'ing Plaintiff.

#104 - #110: Cannot be withheld as privileged as not sent to the client: Emails among Larry Rosen and **Eric Trump** (works for Trump Org / not the Campaign)

#111 - #112: Cannot be withheld as privileged because non-party/non-attorney is copied: Emails among Michael Glassner, John Pence (Campaign staffer), and Larry Rosen, cc'ing **Eric Trump** (works for Trump Org / not the Campaign) and **Alan Garten** (an attorney for Trump Org and not part of the Campaign)



#113: Cannot be withheld as privileged because non-party/non-attorney is copied: Email to Michael Glassner, **Eric Trump** (works for Trump Org / not the Campaign) from **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#114: Cannot be withheld as privileged: No recipient or sender listed

#115 - #119: Cannot be withheld as privileged because non-party/non-attorney is copied: Emails among **Alan Garten** (an attorney for Trump Org and not part of the Campaign), Michael Glassner, and **Eric Trump** (works for Trump Org / not the Campaign). **Not a single Trump Campaign attorney is part of these emails.**

#120 - #125: Cannot be withheld as privileged because not sent to client: Emails among Larry Rosen and **Eric Trump** (works for Trump Org / not the Campaign)

#126: Cannot be withheld as privileged because not among Trump Campaign attorney or client: Email to **Alan Garten** (an attorney for Trump Org and not part of the Campaign) and **Eric Trump** (works for Trump Org / not the Campaign) from **Kimberly Benza** (Trump Org staffer – not the Campaign) ([kbenza@trumporg.com](mailto:kbenza@trumporg.com))

#127: Cannot be withheld as privileged because not to/from client: Email to Larry Rosen and **Matthew Maron** (TrumpOrg) from **Alan Garten** (an attorney for Trump Org and not part of the Campaign), cc'ing **Eric Trump** (works for Trump Org / not the Campaign)

#128: Cannot be withheld as privileged because non-party/non-attorney is copied: Email among **Alan Garten** (an attorney for Trump Org and not part of the Campaign), Jones Day attorney Stewart Crosland, Larry Rosen, **Eric Trump** (works for Trump Org / not the Campaign), **Matthew Maron** (Trump Org), Michael Glassner, and another Jones Day attorney, Benjamin Ginsberg

#129: Cannot be withheld as privileged: No sender or recipient listed

#130 - #132: Cannot be withheld as privileged because non-party/non-attorney is copied: Emails among **Alan Garten** (an attorney for Trump Org and not part of the Campaign), a Jones Day attorney<sup>i</sup>, Larry Rosen, **Eric Trump** (works for Trump Org / not the Campaign), **Matthew Maron** (Trump Org), Michael Glassner, and another Jones Day attorney

#133 - #136: Cannot be withheld as privileged because not with client: Emails among Larry Rosen and **Eric Trump** (works for Trump Org / not the Campaign)

#137 - #138: Cannot be withheld as privileged because non-party/non-attorney is copied: Emails among Michael Glassner, **Eric Trump** (works for Trump Org / not the Campaign), **Alan Garten** (an attorney for Trump Org and not part of the Campaign), and Larry Rosen, cc'ing Patrick McPartland

#139-#141: Cannot be withheld as privileged because non-party/non-attorney is copied: Emails among Larry Rosen, Michael Glassner, **Eric Trump** (works for Trump Org / not the Campaign), **Alan Garten** (an attorney for Trump Org and not part of the Campaign)

#142 - #143: Cannot be withheld as privileged because non-party/non-attorney is copied: Email Larry Rosen, Michael Glassner, **Eric Trump** (works for Trump Org / not the Campaign), **Alan Garten** (an attorney for Trump Org and not part of the Campaign), and Patrick McPartland

#144-#145: Cannot be withheld as privileged because not among Campaign attorney or client: Emails between **Alan Garten** (an attorney for Trump Org and not part of the Campaign) and **Eric Trump** (works for Trump Org / not the Campaign)

Lastly, in Eric Trump's deposition, Mr. Trump stated he had met with Mr. Blumetti, the Defendant-Campaign's then-counsel, the day prior, along with his attorney, to discuss the deposition. When asked what Mr. Trump discussed with Mr. Blumetti, Ms. Habba (who claimed to be Mr. Trump's attorney at the deposition, despite having entered no notice of appearance), stated that Mr. Trump's communication was privileged, as a common interest privilege. Plaintiff noted this would be addressed with the Court, and does so herein, as follows: Not only would a privilege log be required memorializing the conversation/meeting (per S.D.N.Y. rules, privilege logs also apply to oral communications) but there has been no information or grounds provided to sustain the claim that Mr. Trump has a common interest privilege with the Defendant-Campaign.

For all the reasons above, Plaintiff respectfully seeks the various orders to compel.

Respectfully submitted,

s/Arlene Delgado  
Arlene Delgado  
Plaintiff, pro-se

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<sup>i</sup> Jones Day was counsel for the Campaign at one point and therefore Plaintiff extends such understanding for purposes of privilege log and privilege applying between Jones Day and the Campaign



CONFIDENTIAL

February 6, 2024 Subpoena to Eric Trump  
Delgado v. Donald J. Trump for President, et al  
19-cv-11764

Privilege Log  
March 13, 2024

Log #	DocumentID	ProdBegBates	ProdEndBates	Email To	Email From	Email CC	Email BCC	Date Sent	Email Subject	Attorney Review Comments	Privilege	Redaction
1	TRU1_15371_00000060	ET00001	ET00001	Larry Rosen <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>	Michael Glassner <mglassner@donaldtrump.com>; Lara Trump <lara@gilesparscale.com>; Alan Garten <agarten@trumporg.com>		8/10/2017	Confidential	Attorney-client communication that requests an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
2	TRU1_15371_00000061	ET00002	ET00002	Michael Glassner <mglassner@donaldtrump.com>	Lara Trump <lara@gilesparscale.com>	Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>		8/22/2017	Re: Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
3	TRU1_15371_00000062	ET00003	ET00003	lara@gilesparscale.com	Michael Glassner <mglassner@donaldtrump.com>	Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>		8/22/2017	RE: Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
4	TRU1_15371_00000065	ET00004	ET00004	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			9/21/2017	Re: AJ Delgado	Attorney-client communication that requests an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
5	TRU1_15371_00000066	ET00005	ET00005	Lawrence Rosen <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>			9/21/2017	Re: AJ Delgado	Attorney-client communication that requests an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
6	TRU1_15371_00000068	ET00007	ET00007	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			9/22/2017	Re:	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
7	TRU1_15371_00000069	ET00008	ET00008	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			9/23/2017	RE:	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
8	TRU1_15371_00000070	ET00009	ET00009	Lawrence Rosen <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>			9/23/2017	Re:	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
9	TRU1_15371_00000071	ET00010	ET00010	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			9/23/2017	RE:	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
10	TRU1_15371_00000072	ET00011	ET00011	Eric Trump <etrump@trumporg.com>; Lawrence Rosen <lrosen@lhr gb.com>; Alan Garten <agarten@trumporg.com>	Michael Glassner <mglassner@donaldtrump.com>			10/6/2017	RE: Case Number 01-17-004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
11	TRU1_15371_00000077	ET00012	ET00012	Lawrence Rosen <lrosen@lhr gb.com>; Alan Garten <agarten@trumporg.com>; Michael S. Glassner <mglassner@donaldtrump.com>	Eric Trump <etrump@trumporg.com>			11/2/2017	Re: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
12	TRU1_15371_00000079	ET00015	ET00015	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			11/6/2017	RE: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full

Log #	DocumentID	ProdBegBates	ProdEndBates	Email To	Email From	Email CC	Email BCC	Date Sent	Email Subject	Attorney Review Comments	Privilege	Redaction
13	TRU1_15371_00000082	ET00016	ET00016	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			1/23/2018	RE: AAA	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
14	TRU1_15371_00000083	ET00017	ET00017	Lawrence Rosen <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>			1/23/2018	Re: AAA	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
15	TRU1_15371_00000090	ET00018	ET00018	"Eric Trump (etrump@trumporg.com) <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			4/30/2018	this work?	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
16	TRU1_15371_00000091	ET00019	ET00019	Lawrence Rosen <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>			4/30/2018	Re: this work?	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
17	TRU1_15371_00000094	ET00020	ET00020	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			5/1/2018	RE: this work?	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
18	TRU1_15371_00000095	ET00021	ET00021	Lawrence Rosen <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>			5/1/2018	RE: this work?	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
19	TRU1_15371_00000218	ET00023	ET00023	etrump@trumporg.com; Michael Glassner <mglassner@donalddtrump.com>	Lawrence Rosen <lrosen@lhr gb.com>	agarten@trumporg.com; Patrick Mcpartland <pmcpartland@lhr gb.com>		11/11/2019	FW: AJ Delgado adv. Trump Campaign	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
20	TRU1_15371_00000223	ET00025	ET00025	etrump@trumporg.com; agarten@trumporg.com	Lawrence Rosen <lrosen@lhr gb.com>			11/12/2019	FW: Trump/Delgado (Response to lawyer letter)	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
21	TRU1_15371_00000224	ET00026	ET00026							Communication and attorney work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
22	TRU1_15371_00000225	ET00027	ET00027	etrump@trumporg.com	Lawrence Rosen <lrosen@lhr gb.com>			11/12/2019	AJ	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
23	TRU1_15371_00000226	ET00028	ET00028							Communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
24	TRU1_15371_00000227	ET00029	ET00029							Communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
25	TRU1_15371_00000228	ET00030	ET00030	Lawrence Rosen <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>			11/12/2019	Re: AJ	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full

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26	TRU1_15371_00000229	ET00031	ET00031	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>			11/12/2019	RE: AJ	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
27	TRU1_15371_00000230	ET00032	ET00032	Lawrence Rosen <lrosen@lhrbg.com>	Eric Trump <etrump@trumporg.com>			11/12/2019	Re: AJ	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
28	TRU1_15371_00000231	ET00033	ET00033	Lawrence Rosen <lrosen@lhrbg.com>; Eric Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>			11/12/2019	RE: Trump/Delgado (Response to lawyer letter)	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
29	TRU1_15371_00000238	ET00034	ET00034	etrump@trumporg.com; Alan Garten <agarten@trumporg.com>; Michael Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhrbg.com>	Patrick Mcpartland <pmcpartland@lhrbg.com>		12/6/2019	A. J. Delgado v. Trump - CONFIDENTIAL SETTLEMENT COMMUNICATION	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
30	TRU1_15371_00000240	ET00044	ET00044	Lawrence Rosen <lrosen@lhrbg.com>; Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>	Patrick Mcpartland <pmcpartland@lhrbg.com>		12/6/2019	Re: [EXTERNAL]A. J. Delgado v. Trump - CONFIDENTIAL SETTLEMENT COMMUNICATION	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
31	TRU1_15371_00000241	ET00045	ET00045	Michael Glassner <mglassner@donaldrump.com>; Lawrence Rosen <lrosen@lhrbg.com>; Alan Garten <agarten@trumporg.com>	Eric Trump <etrump@trumporg.com>	Patrick Mcpartland <pmcpartland@lhrbg.com>		12/6/2019	Re: [EXTERNAL]A. J. Delgado v. Trump - CONFIDENTIAL SETTLEMENT COMMUNICATION	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
32	TRU1_15371_00000242	ET00046	ET00046	Eric Trump <etrump@trumporg.com>; Michael Glassner <mglassner@donaldrump.com>; Alan Garten <agarten@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>	Patrick Mcpartland <pmcpartland@lhrbg.com>		12/6/2019	RE: [EXTERNAL]A. J. Delgado v. Trump - CONFIDENTIAL SETTLEMENT COMMUNICATION	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
33	TRU1_15371_00000285	ET00047	ET00047	etrump@trumporg.com	Lawrence Rosen <lrosen@lhrbg.com>			12/20/2019	FW: CONFIDENTIAL COMMUNICATION re: A.J. Delgado v. Donald J. Trump For President, INC. et. al.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
34	TRU1_15371_00000286	ET00048	ET00048							Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
35	TRU1_15371_00000287	ET00049	ET00049	etrump@trumporg.com	Lawrence Rosen <lrosen@lhrbg.com>	agarten@trumporg.com		12/23/2019	CONFIDENTIAL COMMUNICATION re: A.J. Delgado v. Donald J. Trump For President, INC. et. al.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
36	TRU1_15371_00000288	ET00050	ET00050							Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
37	TRU1_15371_00000289	ET00051	ET00051	Lawrence Rosen <lrosen@lhrbg.com>; Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>			12/24/2019	Re: [EXTERNAL]CONFIDENTIAL COMMUNICATION re: A.J. Delgado v. Donald J. Trump For President, INC. et. al.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
38	TRU1_15371_00000290	ET00052	ET00052	Michael Glassner <mglassner@donaldrump.com>; Lawrence Rosen <lrosen@lhrbg.com>; Alan Garten <agarten@trumporg.com>	Eric Trump <etrump@trumporg.com>			12/24/2019	Re: [EXTERNAL]CONFIDENTIAL COMMUNICATION re: A.J. Delgado v. Donald J. Trump For President, INC. et. al.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full

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39	TRU1_15371_00000291	ET00053	ET00053	etrump@trumporg.com; agarten@trumporg.com	Lawrence Rosen <lrosen@lhr gb.com>			12/26/2019	RE: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
40	TRU1_15371_00000292	ET00054	ET00054	Lawrence Rosen <lrosen@lhr gb.com>; Alan Garten <agarten@trumporg.com>	Eric Trump <etrump@trumporg.com>			12/26/2019	Re: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
41	TRU1_15371_00000293	ET00055	ET00055	Eric Trump <etrump@trumporg.com>; Lawrence Rosen <lrosen@lhr gb.com>	Alan Garten <agarten@trumporg.com>			12/27/2019	Re: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
42	TRU1_15371_00000314	ET00056	ET00056	Michael Glassner <mglassner@donaldrump.com>; etrump@trumporg.com	Lawrence Rosen <lrosen@lhr gb.com>	agarten@trumporg.com; Patrick Mcpartland <pmcpartland@lhr gb.com>		4/7/2020	FW: Activity in Case 1:19-cv-11764-AT Delgado v. Donald J. Trump For President, Inc. et al Motion to Adjourn Conference	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
43	TRU1_15371_00000316	ET00059	ET00059	Michael Glassner <mglassner@donaldrump.com>; etrump@trumporg.com	Lawrence Rosen <lrosen@lhr gb.com>	agarten@trumporg.com; Patrick Mcpartland <pmcpartland@lhr gb.com>		4/7/2020	RE: Activity in Case 1:19-cv-11764-AT Delgado v. Donald J. Trump For President, Inc. et al Motion to Adjourn Conference	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
44	TRU1_15371_00000339	ET00063	ET00063	agarten@trumporg.com; etrump@trumporg.com; Michael Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhr gb.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		5/13/2020	FW: Delgado - Final motion to compel/dismiss	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
45	TRU1_15371_00000342	ET00084	ET00084	Lawrence Rosen <lrosen@lhr gb.com>; Alan Garten <agarten@trumporg.com>; Michael Glassner <mglassner@donaldrump.com>	Eric Trump <etrump@trumporg.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		5/13/2020	RE: Delgado - Final motion to compel/dismiss	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
46	TRU1_15371_00000343	ET00085	ET00085	Lawrence Rosen <lrosen@lhr gb.com>; Eric Trump <etrump@trumporg.com>; Michael Glassner <mglassner@donaldrump.com>	Alan Garten <agarten@trumporg.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		5/13/2020	Re: Delgado - Final motion to compel/dismiss	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
47	TRU1_15371_00000344	ET00086	ET00086	Lawrence Rosen <lrosen@lhr gb.com>; Alan Garten <agarten@trumporg.com>; Michael Glassner <mglassner@donaldrump.com>	Eric Trump <etrump@trumporg.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>; Donald Trump Jr. <djtjr@trumporg.com>		5/13/2020	RE: Delgado - Final motion to compel/dismiss	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
48	TRU1_15371_00000345	ET00087	ET00087	Alan Garten <agarten@trumporg.com>; Lawrence Rosen <lrosen@lhr gb.com>; Eric Trump <etrump@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		5/13/2020	RE: [EXTERNAL]Re: Delgado - Final motion to compel/dismiss	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
49	TRU1_15371_00000346	ET00088	ET00088	Michael Glassner <mglassner@donaldrump.com>; Alan Garten <agarten@trumporg.com>; Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		5/13/2020	RE: [EXTERNAL]Re: Delgado - Final motion to compel/dismiss	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
50	TRU1_15371_00000347	ET00089	ET00089	Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>; Michael Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhr gb.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>; Donald Trump Jr. <djtjr@trumporg.com>		5/13/2020	RE: Delgado - Final motion to compel/dismiss	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
51	TRU1_15371_00000348	ET00090	ET00090	agarten@trumporg.com; mglassner@donaldrump.com; etrump@trumporg.com; Donald Trump Jr. <djtjr@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		5/13/2020	FW: Trump/Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full

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52	TRU1_15371_00000349	ET00091	ET00091	Lawrence Rosen <lrosen@lhr gb.com>; mglassner@donaldrump.com; Eric Trump <etrump@trumporg.com>; Donald Trump Jr. <djtr@trumporg.com>	Alan Garten <agarten@trumporg.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		5/13/2020	RE: Trump/Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
53	TRU1_15371_00000362	ET00092	ET00092	etrump@trumporg.com	Lawrence Rosen <lrosen@lhr gb.com>	agarten@trumporg.com; mglassner@donaldrump.com		6/5/2020	PRIVILEGED AND CONFIDENTIAL Jason Miller	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
54	TRU1_15371_00000363	ET00093	ET00093	Donald Trump Jr. <djtr@trumporg.com>; etrump@trumporg.com; mglassner@donaldrump.com; agarten@trumporg.com	Lawrence Rosen <lrosen@lhr gb.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		6/5/2020	FW: Delgado - Final motion to compel/dismiss	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
55	TRU1_15371_00000364	ET00094	ET00094	Lawrence Rosen <lrosen@lhr gb.com>; Donald Trump Jr. <djtr@trumporg.com>; mglassner@donaldrump.com; Alan Garten <agarten@trumporg.com>	Eric Trump <etrump@trumporg.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		6/5/2020	Re: Delgado - Final motion to compel/dismiss	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
56	TRU1_15371_00002261	ET00095	ET00095	"Ginsberg, Benjamin L." <bginsberg@jonesday.com>	Alan Garten <agarten@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>; Eric Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>		8/27/2019	PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
57	TRU1_15371_00002262	ET00096	ET00096	Lawrence Rosen <lrosen@lhr gb.com>; "Ginsberg, Benjamin L." <bginsberg@jonesday.com>; Alan Garten <agarten@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>	Eric Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>; Stewart Crosland <scrosland@jonesday.com>		8/27/2019	Re: PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
58	TRU1_15371_00002263	ET00097	ET00097	Michael Glassner <mglassner@donaldrump.com>; Lawrence Rosen <lrosen@lhr gb.com>; "Ginsberg, Benjamin L." <bginsberg@jonesday.com>; Alan Garten <agarten@trumporg.com>	"Crosland, Stewart" <scrosland@jonesday.com>	Eric Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>; "Crosland, Stewart" <scrosland@jonesday.com>		8/27/2019	RE: PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
59	TRU1_15371_00002264	ET00098	ET00098	Stewart Crosland <scrosland@jonesday.com>; Lawrence Rosen <lrosen@lhr gb.com>; "Ginsberg, Benjamin L." <bginsberg@jonesday.com>; Alan Garten <agarten@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>	Eric Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>; Stewart Crosland <scrosland@jonesday.com>		8/28/2019	Re: PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
60	TRU1_15371_00002265	ET00099	ET00099	Michael Glassner <mglassner@donaldrump.com>; Lawrence Rosen <lrosen@lhr gb.com>; "Ginsberg, Benjamin L." <bginsberg@jonesday.com>; Alan Garten <agarten@trumporg.com>	"Crosland, Stewart" <scrosland@jonesday.com>	Eric Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>; "Crosland, Stewart" <scrosland@jonesday.com>		8/28/2019	RE: PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
61	TRU1_15371_00002268	ET00100	ET00100	Stewart Crosland <scrosland@jonesday.com>; Lawrence Rosen <lrosen@lhr gb.com>; "Ginsberg, Benjamin L." <bginsberg@jonesday.com>; Alan Garten <agarten@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>	Eric Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>; Stewart Crosland <scrosland@jonesday.com>		9/4/2019	RE: PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full

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62	TRU1_15371_00002269	ET00101	ET00101	Michael Glassner <mglassner@donaldrump.com>; Lawrence Rosen <lrosen@lhrgb.com>; "Ginsberg, Benjamin L." <bginsberg@jonesday.com>; Alan Garten <agarten@trumporg.com>	"Crosland, Stewart" <scrosland@jonesday.com>	Erie Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>; "Crosland, Stewart" <scrosland@jonesday.com>		9/4/2019	RE: PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
63	TRU1_15371_00002285	ET00102	ET00102	Lawrence Rosen <lrosen@lhrgb.com>; Eric Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>			12/23/2019	Re: "Trump" - new litigation	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
64	TRU1_15371_00002306	ET00103	ET00103	Erie Trump <etrump@trumporg.com>	Alex Cannon <acannon@donaldrump.com>			10/10/2020	AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
65	TRU1_15371_00002307	ET00104	ET00104	Alex Cannon <acannon@donaldrump.com>	Erie Trump <eric.trump@trumporg.com>			10/10/2020	Re: AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
66	TRU1_15371_00002867	ET00105	ET00105	Erie Trump <eric.trump@trumporg.com>	Alan Garten <alan.garten@trumporg.com>			9/13/2023	FW: AAA	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
67	TRU1_15371_00002989	ET00106	ET00106	Susie Wiles <susanswiles@msn.com>; Alina Habba <alina.habba@saveamerica45.com>; Eric Trump <eric.trump@trumporg.com>	Alan Garten <alan.garten@trumporg.com>			1/2/2024	Delgado v. DJT for Preident, Jason Miller, et al.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
68	TRU1_15371_00002991	ET00146	ET00146	Alan Garten <alan.garten@trumporg.com>; Susie Wiles <susanswiles@msn.com>; Eric Trump <eric.trump@trumporg.com>	Alina Habba <alina.habba@saveamerica45.com>			1/2/2024	Re: Delgado v. DJT for Preident, Jason Miller, et al.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
69	TRU1_15371_00003545	ET00159	ET00159	Erie Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>			6/19/2017	Fwd: *Confidential: AJ Delgado --- Discrimination Complaint: Time-Sensitive & Confidential	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
70	TRU1_15371_00003548	ET00162	ET00162	Erie Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>			6/22/2017	FW: Delgado matter	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
71	TRU1_15371_00003558	ET00163	ET00163	"Erie Trump (etrump@trumporg.com)" <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrgb.com>			7/6/2017	Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
72	TRU1_15371_00003559	ET00164	ET00164	Lawrence Rosen <lrosen@lhrgb.com>	Erie Trump <etrump@trumporg.com>			7/6/2017	Re: Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
73	TRU1_15371_00003579	ET00165	ET00165	Michael Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhrgb.com>	Alan Garten <agarten@trumporg.com>; "Erie Trump (etrump@trumporg.com)" <etrump@trumporg.com>		8/1/2017	AJ Delgado vs Trump for DJT for President, Inc.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
74	TRU1_15371_00003580	ET00166	ET00166	Lawrence Rosen <lrosen@lhrgb.com>	Michael Glassner <mglassner@donaldrump.com>	Alan Garten <agarten@trumporg.com>; "Erie Trump (etrump@trumporg.com)" <etrump@trumporg.com>		8/1/2017	Re: AJ Delgado vs Trump for DJT for President, Inc.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
75	TRU1_15371_00003581	ET00167	ET00167	Michael Glassner <mglassner@donaldrump.com>; Erie Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>			8/3/2017	Fwd: PRIVILEGED AND CONFIDENTIAL: Trump/Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full



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76	TRU1_15371_00003582	ET00168	ET00168	Alan Garten <agarten@trumporg.com>; Eric Trump <etrump@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>			8/3/2017	RE: PRIVILEGED AND CONFIDENTIAL: Trump/Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
77	TRU1_15371_00003583	ET00169	ET00169	Alan Garten <agarten@trumporg.com>; Eric Trump <etrump@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>			8/3/2017	RE: PRIVILEGED AND CONFIDENTIAL: Trump/Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
78	TRU1_15371_00003592	ET00170	ET00170	Michael Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhrbg.com>	"Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>		8/11/2017	PRIVILEGED AND CONFIDENTIAL: DRAFT letter re: arbitration (Delgado)	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
79	TRU1_15371_00003593	ET00171	ET00171							Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
80	TRU1_15371_00003594	ET00172	ET00172	"Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>; lara@gilesparscale.com	Lawrence Rosen <lrosen@lhrbg.com>			8/15/2017	A.J. Delgado: From Trump Aide to Single Mom - The Atlantic	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
81	TRU1_15371_00003595	ET00173	ET00173	Lawrence Rosen <lrosen@lhrbg.com>; lara@gilesparscale.com	Eric Trump <etrump@trumporg.com>			8/15/2017	RE: A.J. Delgado: From Trump Aide to Single Mom - The Atlantic	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
82	TRU1_15371_00003597	ET00174	ET00174	Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>; lara@gilesparscale.com	Michael Glassner <mglassner@donaldrump.com>			8/22/2017	Fwd: Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
83	TRU1_15371_00003616	ET00175	ET00175	Larry Rosen <lrosen@lhrbg.com>; Alan Garten <agarten@trumporg.com>	Eric Trump <etrump@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>; Donald Trump Jr. <djtjr@trumporg.com>; Lara Yunaska <larayunaska@gmail.com>		9/21/2017	AJ Delgado	Attorney-client communication that requests an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
84	TRU1_15371_00003627	ET00181	ET00181	Lawrence Rosen <lrosen@lhrbg.com>	Alan Garten <agarten@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>; Eric Trump <etrump@trumporg.com>		9/28/2017	Any news on Delgado?	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
85	TRU1_15371_00003629	ET00182	ET00182	Alan Garten <agarten@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>	Michael Glassner <mglassner@donaldrump.com>; Eric Trump <etrump@trumporg.com>		9/28/2017	Re: Any news on Delgado?	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
86	TRU1_15371_00003630	ET00183	ET00183	Eric Trump <etrump@trumporg.com>; Michael S. Glassner <mglassner@donaldrump.com>; Alan Garten <agarten@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>			9/29/2017	Fwd: Case Number 01-17-004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
87	TRU1_15371_00003634	ET00186	ET00186	Lawrence Rosen <lrosen@lhrbg.com>; Alan Garten <agarten@trumporg.com>	Eric Trump <etrump@trumporg.com>			10/3/2017	A.J.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
88	TRU1_15371_00003635	ET00187	ET00187	Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>			10/3/2017	RE: A.J.	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
89	TRU1_15371_00003639	ET00188	ET00188	Lawrence Rosen <lrosen@lhrbg.com>	Eric Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>		10/4/2017	Re: AJD	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full

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90	TRU1_15371_00003640	ET00189	ET00189	Alan Garten <agarten@trumporg.com>; Lawrence Rosen <lrosen@lhrbg.com>	Eric Trump <etrump@trumporg.com>			10/4/2017	Re: AJD	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
91	TRU1_15371_00003641	ET00190	ET00190	Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>			10/4/2017	Re: AJD	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
92	TRU1_15371_00003642	ET00191	ET00191	Lawrence Rosen <lrosen@lhrbg.com>; Alan Garten <agarten@trumporg.com>	Eric Trump <etrump@trumporg.com>			10/4/2017	Re: AJD	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
93	TRU1_15371_00003661	ET00192	ET00192	Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>; Michael S. Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhrbg.com>			11/2/2017	Fwd: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
94	TRU1_15371_00003663	ET00194	ET00194	Lawrence Rosen <lrosen@lhrbg.com>; Eric Trump <etrump@trumporg.com>; Michael S. Glassner <mglassner@donaldrump.com>	Alan Garten <agarten@trumporg.com>			11/2/2017	RE: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
95	TRU1_15371_00003681	ET00195	ET00195	Lawrence Rosen <lrosen@lhrbg.com>; "Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>			11/28/2017	RE: AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
96	TRU1_15371_00003682	ET00196	ET00196	Michael Glassner <mglassner@donaldrump.com>; Lawrence Rosen <lrosen@lhrbg.com>	Eric Trump <etrump@trumporg.com>			11/28/2017	Re: AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
97	TRU1_15371_00003683	ET00197	ET00197	Eric Trump <etrump@trumporg.com>; Michael Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhrbg.com>			11/28/2017	RE: AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
98	TRU1_15371_00003684	ET00198	ET00198	Eric Trump <etrump@trumporg.com>; Michael Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhrbg.com>			11/29/2017	RE: AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
99	TRU1_15371_00003712	ET00199	ET00199	Eric Trump <etrump@trumporg.com>; Michael S. Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhrbg.com>			1/7/2018	Fwd: Donald J. Trump for President, Inc. V. Arlene Delgado (01-17-0004-4706)	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
100	TRU1_15371_00003715	ET00200	ET00200	"Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>; Michael Glassner <mglassner@donaldrump.com>	Lawrence Rosen <lrosen@lhrbg.com>	Alan Garten <agarten@trumporg.com>		1/8/2018	Trump/Delgado	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
101	TRU1_15371_00003716	ET00201	ET00201	Lawrence Rosen <lrosen@lhrbg.com>; Michael Glassner <mglassner@donaldrump.com>	Eric Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>		1/8/2018	Re: Trump/Delgado	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
102	TRU1_15371_00003732	ET00202	ET00202	Michael Glassner <mglassner@donaldrump.com>; "Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>	Alan Garten <agarten@trumporg.com>; "Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>		1/23/2018	FW: Trump/Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
103	TRU1_15371_00003733	ET00203	ET00203	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>	adelgado@post.harvard.edu		1/23/2018	AAA	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full

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104	TRU1_15371_00003735	ET00207	ET00207	Larry Rosen <lrosen@lhrgb.com>	Eric Trump <etrump@trumporg.com>			1/25/2018	Re: AAA	Attorney-client communication that requests an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
105	TRU1_15371_00003736	ET00208	ET00208	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrgb.com>			1/25/2018	Re: AAA	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
106	TRU1_15371_00003737	ET00209	ET00209	Lawrence Rosen <lrosen@lhrgb.com>	Eric Trump <etrump@trumporg.com>			1/25/2018	Re: AAA	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
107	TRU1_15371_00003738	ET00210	ET00210	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrgb.com>			1/25/2018	RE: AAA	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
108	TRU1_15371_00003753	ET00219	ET00219	"Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrgb.com>			3/1/2018	FW: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
109	TRU1_15371_00003756	ET00220	ET00220	"Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrgb.com>			3/5/2018	FW: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
110	TRU1_15371_00003757	ET00221	ET00221	"Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrgb.com>			3/9/2018	FW: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
111	TRU1_15371_00003758	ET00222	ET00222	Michael Glassner <mglassner@donaldrump.com>; John Pence <jpence@donaldrump.com>	Lawrence Rosen <lrosen@lhrgb.com>	"Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>		3/9/2018	FW: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
112	TRU1_15371_00003759	ET00223	ET00223	Michael Glassner <mglassner@donaldrump.com>; Lawrence Rosen <lrosen@lhrgb.com>	John Pence <jpence@donaldrump.com>	"Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>		3/9/2018	Re: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
113	TRU1_15371_00003873	ET00224	ET00224	"Michael Glassner (mglassner@donaldrump.com)" <mglassner@donaldrump.com>; Eric Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>			8/16/2018	Kasowitz Invoices	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
114	TRU1_15371_00003875	ET00225	ET00225							Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
115	TRU1_15371_00003879	ET00226	ET00226	Alan Garten <agarten@trumporg.com>; "Michael Glassner (mglassner@donaldrump.com)" <mglassner@donaldrump.com>	Eric Trump <etrump@trumporg.com>			8/16/2018	RE: Kasowitz Invoices	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
116	TRU1_15371_00003880	ET00227	ET00227	Eric Trump <etrump@trumporg.com>; "Michael Glassner (mglassner@donaldrump.com)" <mglassner@donaldrump.com>	Alan Garten <agarten@trumporg.com>			8/16/2018	RE: Kasowitz Invoices	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
117	TRU1_15371_00003882	ET00228	ET00228	Alan Garten <agarten@trumporg.com>; Eric Trump <etrump@trumporg.com>	Michael Glassner <mglassner@donaldrump.com>			8/16/2018	RE: Kasowitz Invoices	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full

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118	TRU1_15371_00003883	ET00229	ET00229	Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>	Michael Glassner <mglassner@donaldtrump.com>			8/16/2018	RE: Kasowitz Invoices	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
119	TRU1_15371_00003906	ET00230	ET00230	Eric Trump <etrump@trumporg.com>; Alan Garten <agarten@trumporg.com>	Michael Glassner <mglassner@donaldtrump.com>			9/9/2018	RE: Kasowitz Invoices	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
120	TRU1_15371_00003907	ET00231	ET00231	"Eric Trump (etrump@trumporg.com)" <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>			9/13/2018	FW: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
121	TRU1_15371_00003908	ET00232	ET00232	Lawrence Rosen <lrosen@lhrbg.com>	Eric Trump <etrump@trumporg.com>			9/13/2018	Re: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
122	TRU1_15371_00003909	ET00233	ET00233	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>			9/13/2018	RE: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
123	TRU1_15371_00003927	ET00234	ET00234	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>			11/7/2018	Fwd: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
124	TRU1_15371_00003928	ET00235	ET00235	Lawrence Rosen <lrosen@lhrbg.com>	Eric Trump <etrump@trumporg.com>			11/7/2018	Re: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
125	TRU1_15371_00003929	ET00236	ET00236	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>			11/7/2018	Re: Donald J. Trump for President, Inc. v. Delgado - Case No. 01-17-0004-4706	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
126	TRU1_15371_00004019	ET00237	ET00237	Alan Garten <agarten@trumporg.com>; Eric Trump <etrump@trumporg.com>	Kimberly Benza <kbenza@trumporg.com>			8/26/2019	PRIVLEDGED & CONFIDENTIAL - AD & ET text message	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
127	TRU1_15371_00004021	ET00256	ET00256	Lawrence Rosen <lrosen@lhrbg.com>; Matthew Maron <mmaron@trumporg.com>	Alan Garten <agarten@trumporg.com>	Eric Trump <etrump@trumporg.com>		8/27/2019	RE: Privileged & Confidential / Common Interest Privileged -- AJ Delgado Correspondence	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
128	TRU1_15371_00004023	ET00257	ET00257	Alan Garten <agarten@trumporg.com>	"Ginsberg, Benjamin L." <bginsberg@jonesday.com>	Lawrence Rosen <lrosen@lhrbg.com>; Eric Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>; "Michael Glassner (mglassner@donaldtrump.com)" <mglassner@donaldtrump.com>; "Crosland, Stewart" <scrosland@jonesday.com>		8/27/2019	RE: PRIVILEGED AND CONFIDENTIAL	Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
129	TRU1_15371_00004024	ET00258	ET00258							Attorney-client communication and work product that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
130	TRU1_15371_00004034	ET00259	ET00259	"Crosland, Stewart" <scrosland@jonesday.com>; Michael Glassner <mglassner@donaldtrump.com>; "Ginsberg, Benjamin L." <bginsberg@jonesday.com>; Alan Garten <agarten@trumporg.com>	Lawrence Rosen <lrosen@lhrbg.com>	Eric Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>		9/4/2019	PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full

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131	TRU1_15371_00004037	ET00260	ET00260	Michael Glassner <mglassner@donaldtrump.com>; Alan Garten <agarten@trumporg.com>; Lawrence Rosen <lrosen@lhr gb.com>; "Crosland, Stewart" <scrosland@jonesday.com>	"Ginsberg, Benjamin L." <bginsberg@jonesday.com>	Eric Trump <etrump@trumporg.com>; Matthew Maron <mmaron@trumporg.com>		9/4/2019	RE: PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
132	TRU1_15371_00004038	ET00261	ET00261	"Ginsberg, Benjamin L." <bginsberg@jonesday.com>; Michael Glassner <mglassner@donaldtrump.com>; Alan Garten <agarten@trumporg.com>; Lawrence Rosen <lrosen@lhr gb.com>; "Crosland, Stewart" <scrosland@jonesday.com>	Eric Trump <etrump@trumporg.com>	Matthew Maron <mmaron@trumporg.com>		9/4/2019	RE: PRIVILEGED AND CONFIDENTIAL	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
133	TRU1_15371_00004078	ET00262	ET00262	"Larry Rosen (lrosen@lhr gb.com)" <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>			2/4/2020	AJ is writing again	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
134	TRU1_15371_00004082	ET00263	ET00263	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			2/4/2020	RE: AJ is writing again	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
135	TRU1_15371_00004083	ET00264	ET00264	Lawrence Rosen <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>			2/4/2020	Re: AJ is writing again	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
136	TRU1_15371_00004084	ET00265	ET00265	Eric Trump <etrump@trumporg.com>	Lawrence Rosen <lrosen@lhr gb.com>			2/4/2020	RE: AJ is writing again	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
137	TRU1_15371_00004085	ET00266	ET00266	Michael Glassner <mglassner@donaldtrump.com>; etrump@trumporg.com; agarten@trumporg.com	Lawrence Rosen <lrosen@lhr gb.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		2/4/2020	AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
138	TRU1_15371_00004086	ET00267	ET00267	Lawrence Rosen <lrosen@lhr gb.com>; Michael Glassner <mglassner@donaldtrump.com>; Eric Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>	Patrick Mcpartland <pmcpartland@lhr gb.com>		2/4/2020	RE: AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
139	TRU1_15371_00004114	ET00268	ET00268	Michael Glassner <mglassner@donaldtrump.com>	Lawrence Rosen <lrosen@lhr gb.com>	etrump@trumporg.com; agarten@trumporg.com		3/16/2020	PRIVILEGED AND CONFIDENTIAL: AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
140	TRU1_15371_00004115	ET00269	ET00269	Lawrence Rosen <lrosen@lhr gb.com>; Michael Glassner <mglassner@donaldtrump.com>	Alan Garten <agarten@trumporg.com>	Eric Trump <etrump@trumporg.com>		3/16/2020	RE: PRIVILEGED AND CONFIDENTIAL: AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication; Attorney Work Product	Withheld in Full
141	TRU1_15371_00004116	ET00270	ET00270	Alan Garten <agarten@trumporg.com>; Michael Glassner <mglassner@donaldtrump.com>	Lawrence Rosen <lrosen@lhr gb.com>	Eric Trump <etrump@trumporg.com>		3/17/2020	RE: PRIVILEGED AND CONFIDENTIAL: AJ Delgado	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
142	TRU1_15371_00004124	ET00271	ET00271	Michael Glassner <mglassner@donaldtrump.com>	Lawrence Rosen <lrosen@lhr gb.com>	etrump@trumporg.com; agarten@trumporg.com; Patrick Mcpartland <pmcpartland@lhr gb.com>		3/23/2020	Trump/Delgado- Arbitration	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
143	TRU1_15371_00004125	ET00272	ET00272	Lawrence Rosen <lrosen@lhr gb.com>; Michael Glassner <mglassner@donaldtrump.com>	Eric Trump <etrump@trumporg.com>	Alan Garten <agarten@trumporg.com>; Patrick Mcpartland <pmcpartland@lhr gb.com>		3/23/2020	Re: Trump/Delgado- Arbitration	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full

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144	TRU1_15371_00004479	ET00277	ET00277	Alan Garten <alan.garten@trumporg.com>	Eric Trump <eric.trump@trumporg.com>			8/23/2023	Fwd: AAA	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full
145	TRU1_15371_00004480	ET00278	ET00278	Eric Trump <eric.trump@trumporg.com>	Alan Garten <alan.garten@trumporg.com>			8/23/2023	Re: AAA	Attorney-client communication that reflects an attorney's impressions, conclusions, and/or legal research or theories regarding pending litigation.	Attorney Client Communication	Withheld in Full